

Privacy Notice for Alumni



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Responsible Person: Operations and Compliance Director

References: Data Protection Policy and Compliance Procedures for Staff (L19)
Information and Records Retention Policy and Procedures (L43)

Policy Number: L50

Introduction

This notice is to help you understand how and why we collect personal information about you and what we do with that information. It also explains the decisions that you can make about your own information.

If you have any questions about this notice please contact the Operations and Compliance Director on 01372 373000.

What is personal information?

Personal information is information that identifies you as an individual and relates to you.

This includes your contact details, next of kin and financial information. CCTV, photos and video recordings of you are also personal information.

Our legal bases for using your information

This section contains information about the legal bases that we are relying on when handling your information.

The information below is a general description of the different legal bases but we have also used a colour code system so that you can see which bases we are relying on for each of the purposes described at paragraphs 1 to 33 below.

Legitimate interests ("L")

This means that the School is using your information when this is necessary for the School's legitimate interests except when your interests and fundamental rights override our legitimate interests.

Specifically, the School has a legitimate interest in:

- Maintaining relationships with alumni and the school community, including direct marketing or fundraising activity.
- Maximising opportunities for pupils past and present to benefit from the expertise of our school community.
- Enabling former pupils to keep in touch with their school friends and teachers, socialise and network professionally.
- Publicising and promoting the School in effective ways utilising all appropriate communications channels, using photographs, videos and images in our publicity and on our social media platforms and website.
- Raising funds to benefit school life, improve the school infrastructure and provide fee-support via bursaries and scholarships.
- Confirming the identity of prospective donors and their background and donor due diligence.
- Promoting the objects and interests of the School. This includes fundraising and using photographs of you at our School events in promotional material.

- Protecting the School's reputation

This means that the School is using your information when this is necessary for the School's legitimate interests except when your interests and fundamental rights override our legitimate interests.

Specifically, the School has a legitimate interest in:

- providing educational services to your child and to other children;
- safeguarding and promoting the welfare of your child, other children and our employees;
- promoting the objects and interests of the School. This includes fundraising and using photographs of you at our school events in promotional material. It also includes making sure that we are able to enforce our rights against you, for example, so that we can contact you if unpaid school fees are due;
- keeping the school buildings safe;
- using your information in connection with legal disputes. For example, if you or your child bring a claim against the School;
- protecting the School's reputation;
- facilitating the efficient operation of the School; and
- ensuring that all relevant legal obligations of the School are complied with (for example in relation to inspections).

In addition your personal information may be processed for the legitimate interests of others. For example another school will have a legitimate interest in knowing if you have not paid School fees that are due to us.

Necessary for contract ("CT")

We will need to use your information in order to perform our obligations under a contract with you for example, we need your name and contact details so that we can send you tickets for an event you want to attend.

Legal obligation ("LO")

Where the School needs to use your information in order to comply with a legal obligation, for example to comply with the Proceeds of Crime Act 2002 and ensure that any large donations are legally given. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

Vital interests ("VI")

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

Performance of a task carried out in the public interest (or carrying out public tasks) ("PI")

The following are examples of when we use your information to perform tasks in the public interest:

- safeguarding and promoting your welfare;
- facilitating the efficient operation of the School; and
- ensuring that we comply with all of our legal obligations.

Substantial public interest ("SP")

The School is also allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is similar to "public interest" in the table above.

Social protection and social security laws

Also the School may use your information to comply with social protection law (e.g. to look after your child) and social security laws. Social protection law is concerned with preventing, managing and overcoming situations that adversely affect people's wellbeing.

Legal claims ("LC")

We are allowed to use your information if this is necessary in relation to legal claims. For example, this allows us to share information with our legal advisors and insurers.

The School must also comply with an additional condition where it processes special categories of personal information for example if we are told about a health condition for somebody attending an event. These

special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation.

More than one basis

In some cases we will rely on more than one basis above for a particular use of your information. In addition, we may move from one of the legal bases listed above to another as circumstances change.

Consent

We may ask for your consent to use your information in certain ways as an alternative to relying on any of the bases in the table above. For example, we may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on legitimate interests. If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please speak to the Operations and Compliance Director if you would like to withdraw any consent given.

How and why does the School collect and use personal information?

The Development Office offers a dedicated programme of activity for OJs (former pupils and former staff), current and former parents and friends of the School which:

- Creates opportunities for our current pupils and enriches their education through the expertise of our School network.
- Helps OJs keep in touch with their School friends and teachers, providing social events and activities.
- Raises funds to benefit our School community and provide fee support via bursaries and scholarships.

We collect information about members of our School community to help us carry out our work.

This information comes from the following sources:

- Correspondence sent directly to the Development Office e.g. emails with updated contact information
- The School's pupil management system, ISAMS
- The School's online OJ section on the website, OJs online
- School listings of pupil clubs and societies e.g. members of the First XV
- School publications, such as The Johnian
- Information collected when leaving the school e.g. university destinations
- As a fundraising organisation, we undertake research using publicly available online sources for example, Companies House, the Electoral Register, company websites, 'rich lists', social networks such as LinkedIn, political and property registers and news archives.
- We may also carry out research using publically available information to identify individuals who may have an affinity to our cause but with whom we are not already in touch. We also use publicly available sources to carry out due diligence on donors in line with the charity's Gift Acceptance Policy and to meet money laundering regulations. This research helps us to understand more about you as an individual so we can focus conversations we have with you about fundraising and volunteering in the most effective way, and ensure that we provide you with an experience as a donor or potential donor which is appropriate for you.
- Donation forms and data collection forms (both in paper form and online) sent to the School

What information do we collect and what do we do with it?

We set out below the different types of personal information we collect and the ways in which we use it. The letters highlighted in different colours below refer to the legal bases we are relying on. Please see the section above for an explanation.

1. We collect personal information (name, date of birth, sex, nationality, names of family members, relationship with other members of the School community) for the upkeep of our records of OJs and and parents **L**, **CI**, **PI**, **SP**

2. We collect professional details (occupation, employer, nature of business, employer location) to identify members of our community who could potentially help our pupils in finding work experience/internships, or volunteer within our wider careers programme - **LI**, **PI**, **SPI**.
3. Your contact details (address, email address, telephone number) helps us to keep in touch with OJs and their parents, to keep our community up to date on news from the School, upcoming events and activities including fundraising. It allows us to send out the School newsletter and the OJ magazine - **LI**.
4. School and university information of pupils (House, school years, university institution, university course, university years, previous school) helps us to upkeep our school records, organise universitybased events, and provide education references for our pupils - **LI**, **CT**, **PI**.
5. We keep details of your interests and hobbies to help us create events and communications which appeal to our School community e.g. golf events for those who played golf as a pupil – **LI**.
6. We use CCTV to make sure the school site is safe. Images captured of you via CCTV will be your personal information. CCTV is not used in private areas such as toilets - **LI**, **CT**, **PI**, **SPI**.
7. Photographs from the school archive and those taken at School events are stored and used in our communications to publicise our work. We use photographs or videos in our publicity and on our social media platforms and website, to show prospective parents and pupils what we do here and to advertise the School - **LI**.
8. Donation/Financial information (donation amount, date, purpose/restriction, regular payment details, Gift Aid eligibility, Gift Aid address) is stored and processed to maintain accurate financial records for the school, and to comply with guidelines of both the Charities Commission and HMRC – **CT**, **LO**.
9. If there is a complaint or grievance made to the School which involves you then we will use your information in connection with that complaint or grievance - **LI**, **PI**, **SPI**.
10. Where appropriate, the School will have information about your religious beliefs and practices for example, if you do not eat certain foods – **LI**.
11. We may supplement any data provided to us by using publicly available information such as directorships, trusteeships, philanthropic history, geographical information, public measure of affluence, networks, news, to help us learn more about our community members and focus our fundraising efforts - **LI**.
12. We may send you information to keep you up to date with what is happening at the School. For example, by sending you information about events and activities taking place (including fundraising events) and the School newsletter - **LI**.
13. We will keep details of School events attended, correspondence and communication preferences to help us communicate with our School community appropriately - **LI**, **CT**.
14. We may use information about you and can keep this information for a very long time if we need this for historical research purposes or for statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School - **LI**.
15. We may use your information when ensuring network and information security, for example, our antivirus software might scan files containing information about you - **LI**.

How is this information stored?

All of our personal data is stored on the School's Development CRM database - Blackbaud Raisers' Edge (the leading provider of specialist software to the non-profit sector in the UK.) This data is processed by St John's School, but is currently hosted by Blackbaud at their Boston server centre. Please note that Blackbaud are participants in the EU-US Privacy Shield.

Sharing information

1. In accordance with our legal obligations, we may share information with local authorities, the Independent Schools Inspectorate and the Department for Education, for example, where we have any safeguarding concerns or to comply with our legal obligations - **LI**, **LO**, **PI**, **SPI**.
2. On occasion, we may need to share information with the police for the prevention and investigation of crime and the prosecution of offenders. We will only do this in specific circumstances to assist the police with their investigations - **LI**, **CT**, **LO**, **PI**, **SPI**.
3. We may need to share information about you with the Health and Safety Executive (a government organisation) if there is a health and safety issue at the School - **LI**, **LO**, **PI**, **SPI**.

4. In certain circumstances, we may also need to share information with our legal advisers for the purpose of obtaining legal advice - **LI**, **LO**, **PI**, **SPI**, **LC**.
5. The School is a charity which means that in exceptional circumstances we may need to share your information with the Charity Commission e.g. in the event of a serious incident - **LI**, **LO**, **PI**, **SPI**.
6. We may share some information with our insurance company, for example, where there is a serious incident at the School - **LI**, **SPI**, **LC**.
7. We may need to share information if there is an emergency, for example, if you are hurt whilst on School premises - **LI**, **V**.

Third party agents

In order to carry out the day-to-day operations of the department, a number of third party agents are occasionally contracted to supply services to the School. These organisations require temporary access to some of the personal data we hold. For all of the below, agreements are in place to ensure that data is stored, transferred, processed and destroyed in line with the School's privacy and data management protocols.

- Name and address data is transferred to mailing houses to assist us on sending mail and publications to our community across the world.
- Name and contact details are shared with Buffalo Fundraising Consultants who assist with our biannual telephone fundraising campaign.
- For individuals who donate to the school via Direct Debit, their Direct Debit details are shared with Rapidata Ltd., who process our Direct Debit donation payments.
- We may also carry out wealth screening to fast track the research using our trusted third party partners.

You will always have the right to opt out of this processing. The following are other examples:

- IT consultants who might access information about you when checking the security of our IT network; and
- We use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the School site.

Data will not be disclosed to external organisations other than those acting as agents for the School, with whom the School has data sharing agreements. The School does not sell or swap any of its data to third parties and does not allow its agents to provide its data to third parties.

How we will contact you

In order to keep our community informed of news from the School and its activities, we will contact former pupils, current parents and former parents from time-to-time. This may be in the form of a monthly newsletter, annual magazine, direct personalised contact (i.e. email, telephone), letters and event invitations. If, at any time, you do not wish to hear from us about a particular matter, via a certain communication channel, or indeed at all, you can let us know at any time by contacting privacy@stjohns.surrey.sch.uk

Sending information to other countries

In certain circumstances, we may send your information to other countries which do not have the same level of protection for personal information as there is in the UK. For example, we may store your information on cloud computer storage based overseas.

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfersoutsideeu/adequacy-protection-personal-data-non-eu-countries_en

If the country that we are sending your information to is not on the list or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland) then it might not have the same level of protection for personal information as there is the UK.

We will provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about the safeguards that are in place, please contact the Operations and Compliance Director.

For how long do we keep your information?

We keep your information securely and only in line with how long it is necessary to keep for a legitimate reason.

In exceptional circumstances we may keep your information for a longer time than usual but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

Please ask for our Information and Records Retention Policy for further information about what type of information we hold and the retention period.

What decisions can you make about your information?

From 25 May 2018 data protection legislation gave you a number of rights regarding your information. Your rights are as follows:

- **Rectification:** if information the School holds about you is incorrect you can ask us to correct it.
- **Access:** you can also ask what information we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to.
- **Deletion:** you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your information to you or to a third party in a format that can be read by computer. This applies where (a) the information has been provided by you; (b) the basis that we are relying on to process your information is consent or contract (please see "Our legal bases for using your information" above); and (c) the information is being processed by us on computer.
- **Restriction:** our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.
- **Object:** you may object to us using your information where:
 - we are using it for direct marketing purposes (e.g. to send you the School magazine);
 - the legal basis on which we are relying is either legitimate interest or performance of a task carried out in the public interest. Please see the section "Our legal bases for using your information" above; and
 - we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of you at a School event for historical reasons.

The Operations and Compliance Director can give you more information about your data protection rights.

Further information and guidance

The Operations and Compliance Director is the person responsible at our School for managing how we look after personal information and deciding how it is shared. Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly. This notice is to explain how we use your personal information. The Operations and Compliance Director can answer any questions which you may have.

This privacy notice does not, and is not intended to, give you any rights which you did not already have. For example, it does not give you any additional contractual rights.

Please speak to the Operations and Compliance Director if:

- you object to us using your information for marketing purposes e.g. to send you information about School events. We will stop using your information for marketing purposes if you tell us not to; or you would like us to update the information we hold about you; or
- you would prefer that certain information is kept confidential.

If you fail to provide certain information when requested, we may not be able to perform our obligations to you. We may also be prevented from complying with our legal obligations.

If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office - ico.org.uk.